



Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

RE: Comments on Waiver Request from ClearRF – DA 13-2465

Dear Ms. Dortch,

Nextivity Inc., a leading provider of Provider Specific Consumer Signal Boosters, thanks the Commission for the opportunity to comment on the Request for Waiver¹ submitted by ClearRF to allow an additional six to ten months to sell signal boosters that do not comply with the technical requirements contained in section 20.21 of the Commission's rules.

Nextivity believes that NO general extension of the March 1st, 2014 deadline is required or warranted. Through a collaborative effort over the last two years, manufacturers and wireless service providers have agreed on a set of rules to govern the design of signal boosters and these rules have been known for almost a year now. Therefore, we believe that the Commission allowed ample time for parties to prepare their products for compliance with the new rules.

However, the test procedures for Consumer Signal Boosters are very new, with no formal KDB yet published for Provider Specific Consumer Signal Boosters for example. Working together with our test partners as well as the OET staff, Nextivity has submitted products for certification and we are expecting the first certification to be received shortly. Based on our understanding, this would mark the first Provider Specific Consumer Signal Booster to be approved and to the best of our knowledge, only the second Consumer Signal Booster in general to be approved. In the wake of these first approvals, our understanding is that there are a large number of additional products in the queue for OET approval. Therefore, we are concerned that the queue is extremely full and that product that are in compliance with section 20.21 and for which test results have been submitted to the Commission may not be certified before the March 1st, 2014 date.

858.485.9442 (main) ¹ See Request for Waiver of ClearRF, L.L.C., WT Docket No. 10-4 (filed December 27, 2013).

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Based on these practical considerations, we request that the Commission give a commitment to process all Consumer Signal Booster certification requests within 4 weeks of receipt by the Commission. This way, manufacturers that have submitted product by the end of January 2014 can have confidence that they can sell these products come March 1st, 2014 if they are deemed to pass all tests by OET.

In case such a commitment cannot be made, we request the Commission to provide a more specific waiver to the March 1st date for products that have already been certified under the old FCC rules and which are now being re-submitted to the commission for approval by January 31st, 2014.

We hope that you will find this proposal fair and equitable. Our intent is obviously to only allow products that comply with section 20.21 to be sold, but we need to take the reality of the large test burden that faces OET into account and provide manufacturers with clarity as to the timing of new product sales.

Sincerely,

Michiel Lotter
CTO & VP Engineering
Nextivity Inc.